

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

JAMES GHAI SAR, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 1:19-cv-1224 (CMH/IDD)

**PLAINTIFFS' UNOPPOSED MOTION TO MODIFY
PROTECTIVE ORDER ENTERED MARCH 6, 2020**

Plaintiffs, by undersigned counsel, respectfully request that this Court modify the Protective Order entered on March 6, 2020, by amending Section 4(c) by inserting an additional subsection, 4(c)(vi), which states: "The Office of the Fairfax Commonwealth's Attorney may receive use of force expert reports as well as any other mutually agreed materials. Plaintiffs will notify the United States regarding any other specific materials they wish to transfer to the Office of the Fairfax Commonwealth's Attorney, and the United States will indicate whether it mutually agrees to the transfer within 48 hours."

Counsel for the United States has stated that the United States does not object to Plaintiffs' request. Pursuant to Local Civil Rule 7, Plaintiffs waive a hearing on this motion.

Dated: August 7, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed the foregoing via the CM/ECF system, which will send a Notification of Electronic Filing to the following:

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